

# **EXHIBIT E**

## **Evelyn Fuentes-Rivera**

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**From:** Luciana P. Lalande  
**Sent:** Friday, April 15, 2022 8:42 AM  
**To:** Failla, John E.  
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**Subject:** Re: Valeant Pharmaceuticals Int'l. Inc., et al. v. AIG Ins. Co. of Canada, et al.

John,


Please do provide the response on the search terms today as indicated so we can wrap that up asap. Let's keep that issue separate from the production of the AIG/AWAC settlement agreement. We are extremely close to finalizing what we have with the current revised stipulation, and can bring closure to that and move forward.

The issue regarding production of the AIG/AWAC settlement agreement, which is clearly a relevant document, will take more time to resolve as Defendants will need time to consider and respond to Plaintiffs' proposal to produce the agreement in redacted form and you have already indicated the production will need to be discussed with counsel for AIG and AWAC. We can prepare a separate stipulation as to that issue, if needed, when appropriate. To move things along, why don't we also schedule a brief joint call with counsel for AIG and AWAC next week to determine whether their clients object to Plaintiffs' producing the agreement - in full or in some redacted form - subject to the Confidentiality Order?

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